

**EXHIBIT B**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

Presentment Date: June 16, 2015  
Time: 12:00 p.m.

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Objections Due: June 16, 2015  
Time 11:00 a.m.

Plaintiff-Applicant,

Adv. Pro. No. 08-01789 (SMB)

v.

SIPA Liquidation

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

**ORDER GRANTING TRUSTEE'S APPLICATION TO RETAIN TARTER KRINSKY &  
DROGIN LLP AS SPECIAL COUNSEL *NUNC PRO TUNC* AS OF APRIL 13, 2015**

Upon the Application (the "Application") of Irving H. Picard (the "Trustee"), as Trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, and the estate of Bernard L. Madoff, for authority to retain Tarter Krinsky & Drogin LLP as special counsel as of April 13, 2015, and upon the declaration of Paul Richard Karan submitted in connection therewith; and due and proper notice having been given under the circumstances of this case, and after due deliberation,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED.
2. The Court finds that Tarter Krinsky & Drogin LLP is deemed disinterested under 15 U.S.C. § 78eee(b)(6)(B).

3. The Trustee is authorized to retain Tarter Krinsky & Drogin LLP as special counsel to the Trustee as provided in the Application, *nunc pro tunc*, as of April 13, 2015.

Dated: New York, New York  
\_\_\_\_\_, 2015

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE